

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Promoting Interoperability in the 700 MHz Commercial Spectrum	)	WT Docket No. 12-69
	)	
Interoperability of Mobile User Equipment Across Paired Commercial Spectrum Blocks in the 700 MHz Band	)	RM-11592 (Terminated)
	)	

**REPLY COMMENTS OF CENTURYLINK**

CenturyLink, Inc. files these comments in accord with the *Notice* in the above-captioned proceeding,<sup>1</sup> and urges the Commission to take all reasonable steps necessary to eliminate Channel 51 interference issues as quickly as possible.<sup>2</sup> CenturyLink agrees with the opening comments of parties in this proceeding that action is necessary to ensure that 700 MHz band spectrum -- especially the Lower 700 MHz A Block -- can be put to use efficiently and effectively.<sup>3</sup>

To resolve concerns that are impeding deployment by Lower 700 MHz A Block licensees, the Commission should take certain steps. *First*, the Commission should promptly move forward with its plan to initiate “a separate proceeding to address interference issues

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<sup>1</sup> *Promoting Interoperability in the 700 MHz Commercial Spectrum, Interoperability of Mobile User Equipment Across Paired Commercial Spectrum Blocks in the 700 MHz Band*, FCC 12-31, Notice of Proposed Rulemaking, WT Docket No. 12-69, RM-11592 (Terminated), 27 FCC Rcd 3521 (2012); 77 Fed. Reg. 19575 (Apr. 2, 2012).

<sup>2</sup> CenturyLink has an interest in this proceeding, as a holder, through certain subsidiaries, of certain licenses for 700 MHz Lower A, B, & C Block spectrum.

<sup>3</sup> See Verizon Wireless at 2-4; AT&T at 7-8; 45-46; Blooston Rural Carriers at 5; Cavalier Wireless and Continuum 700 at 14; Cricket at 10-11; CTIA at 3-6; MetroPCS at 12; NTCA at 8-9; RIM at 14-15; US Cellular at 21.

between Channel 51 television operations and Lower 700 MHz A Block operations.”<sup>4</sup>

CenturyLink also agrees with suggestions that in such a proceeding, the Commission should develop incentives for Channel 51 broadcasters to relocate voluntarily as soon as possible, thereby removing an important obstacle to effective Lower 700 MHz A Block deployment.<sup>5</sup>

*Second*, the Commission should revise the rapidly-approaching June 2013 interim construction benchmark for Lower 700 MHz A and B Block licensees, now less than a year away. Ongoing interference concerns and uncertainty around the regulatory or industry solution to them renders effective build-out and use of such licenses -- especially those in the A Block -- especially difficult. Given that these challenges are outside the control of the affected licensees, the Commission should extend the time for meeting the interim construction benchmark until after a solution to Channel 51 interference issues is adopted and implemented.

The limited supply of Band 12 devices further hinders Lower 700 MHz A Block deployment and justifies extension of the forthcoming build-out benchmark. While some Band 12 chipsets and a few consumer devices have become available, the continuing production and pervasiveness of devices that exclusively support Band 17 create substantial business challenges, in turn contributing to the delay in meeting the stringent interim construction benchmark for A Block licensees. Therefore, the Commission should not continue to maintain a June 2013 deadline for that benchmark while interference and equipment availability issues inhibit the effective use of A Block spectrum.

Addressing channel 51 interference concerns would have a secondary benefit, as those interference concerns have made Lower 700 MHz B and C Block licensees wary of deploying Band 12-equipped devices and therefore have limited the availability of interoperable devices to

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<sup>4</sup> Notice at n. 127.

<sup>5</sup> See, e.g., Verizon Wireless at 3.

A Block licensees. Thus, to Verizon's point, the elimination of those interference concerns in and of itself may facilitate an industry solution to interoperability in the Lower 700 MHz band.

In sum and for the reasons stated above, CenturyLink agrees that by addressing Channel 51 interference issues promptly the Commission will promote more investment confidence and effective use of 700 MHz spectrum in general, and Lower A Block spectrum in particular.

Respectfully submitted,

**CENTURYLINK**

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